

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>NADAJALIETTE MONTALVO,</b>	)	
	)	
<b>Plaintiff,</b>	)	
<b>v.</b>	)	
	)	<b>Civil Action No. 3:24-cv-303</b>
<b>WORLDWIDE FLIGHT SERVICES</b>	)	
<b>INC. and IAS LOGISTICS DFW, LLC</b>	)	
<b>d/b/a PINNACLE LOGISTICS</b>	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO  
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S PETITION**

COMES NOW Defendants Worldwide Flight Services, Inc. and IAS Logistics DFW, LLC, d/b/a Pinnacle Logistics ("Defendants"), by and through their undersigned counsel, and move the Court for an extension of time, up to and including March 29, 2024, to answer or otherwise respond to the Petition for Damages ("Petition") filed by Plaintiff Nadajaliette Montalvo ("Plaintiff"). In support of this Motion, Defendants state as follows:

1. Plaintiff's Petition was filed on February 7, 2024.
2. Defendant Worldwide Flight Services was served with a Summons and Plaintiff's Petition on February 8, 2024.
3. The current deadline for Defendants to file their answer or other responsive pleading is February 29, 2024.
4. The undersigned counsel for Defendants is currently investigating the allegations contained in Plaintiff's Petition so that they may accurately and fully respond to Plaintiff's Petition; however, due to the fact that the undersigned counsel was only just recently retained to represent Defendants in this matter, and Defendants' counsel's business schedule, counsel for

Defendants has not completed the investigation and will not have ample time to do so before the current deadline to respond to Plaintiff's Petition has expired. As such, Defendants are requesting additional time, up to and including March 29, 2024, to answer or otherwise respond to Plaintiff's Petition.

5. The undersigned counsel for Defendants has conferred with counsel for Plaintiff, Travis Gasper, and counsel for Plaintiff consented to the extension requested in this Motion.

6. Defendants have not requested any prior extension of the case deadline set forth herein.

7. This Motion is not made for the purpose of delaying the adjudication of this case or for any other improper purpose but is made in good faith. Plaintiff will suffer no prejudice if the Court grants this Motion. Defendants, however, will be prejudiced if they do not have sufficient time to investigate and fully and accurately respond to Plaintiff's Petition.

WHEREFORE, Defendants respectfully requests that the Court grant an extension of time, up to and including March 29, 2024, to answer or otherwise respond to Plaintiff's Petition. A proposed Order is attached hereto.

Respectfully submitted this 29th day of February, 2024.

**CONSTANGY, BROOKS, SMITH &  
PROPHETE, LLP**

/s/ Tedrick Hawkins

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ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that on the 29th day of February 2024, a true and correct copy of the above and foregoing DEFENDANTS WORLDWIDE FLIGHT SERVICES, INC. and IAS LOGISTICS DFW, LLC, d/b/a PINNACLE LOGISTICS UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S PETITION was served via the Court's electronic case filing system, on the following:

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ATTORNEY FOR PLAINTIFF

/s/ Tedrick Hawkins  
Attorney for Defendants